

1 SEYFARTH SHAW LLP
2 Michael J. Burns (SBN 172614)
E-mail: mburns@seyfarth.com
3 Michael T. McKeeman (SBN 173662)
E-mail: mmckeeman@seyfarth.com
4 Joseph J. Orzano (SBN 262040)
E-mail: jorzano@seyfarth.com
5 560 Mission Street, Suite 3100
San Francisco, California 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

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7 Attorneys for Big O Tires, LLC

8 LAGARIAS & BOULTER LLP
Peter C. Lagarias (SBN 77091)
E-mail: pcl@lb-attorneys.com
9 Robert S. Boulter (SBN 153549)
E-mail: rsb@lb-attorneys.com
10 1629 Fifth Avenue
San Rafael, California 94901-1828
11 Telephone: (415) 460-0100
Facsimile: (415) 460-1099

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13 Attorneys for Sonoma Tires, Inc. and
John G. Rhiel, IV

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17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 SONOMA TIRES, INC., a California) Case No. C 11-0818 RS
21 Corporation,)
Plaintiff,)
22 v.)
BIG O TIRES, LLC, a Colorado Limited)
Liability Company,)
Defendant.)
23)
24)

25 Big O Tires, LLC (“Big O”), on the one hand, and Sonoma Tires, Inc. (“Sonoma”) and
26 John G. Rhiel, IV (“Rhiel”), on the other hand, (collectively, “Parties”) by and through their
27 respective undersigned counsel, hereby stipulate and jointly request that the Court issue an Order
28 as follows:

WHEREAS, the parties current deadline to complete non-expert depositions is July 16, 2012;

WHEREAS, the parties have completed some but not all non-expert depositions in this matter;

WHEREAS, the parties have met and conferred and, due to scheduling issues, desire to complete all discovery, including depositions, by on or before August 3, 2012;

WHEREAS, the current scheduling order, as modified by the Court's May 4, 2012 Order, provides adequate time to allow for the requested modification without extending the trial date;

IT IS THEREFORE STIPULATED AND JOINTLY REQUESTED that:

1. The Court order that the parties shall have up to and including August 3, 2012 to complete non-expert discovery, including non-expert depositions;
2. The Court order that the parties shall have up to and including October 11, 2012 to have heard all pretrial motions, including but not limited to any motion for summary judgment and/or summary adjudication; and
3. All other deadlines remain as set forth the Court's scheduling order.

IT IS SO STIPULATED.

SEYFARTH SHAW LLP

Dated: July 13, 2012

By /s/ Joseph J. Orzano
Joseph J. Orzano
Attorneys for Big O Tires, LLC

LAGARIAS & BOULTER, LLP

Dated: July 13, 2012

By /s/ Peter C. Lagarias
Peter C. Lagarias
Attorneys for Sonoma Tires, Inc. and
John G. Rhiel, IV

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1 **[PROPOSED] ORDER**

2 **PURSUANT TO STIPULATION, IT IS SO ORDERED,**

3 1. The parties shall have up to and including August 3, 2012 to complete non-expert
4 discovery, including non-expert depositions;
5 2. All pretrial motions shall be heard no later than October 11, 2012; and
6 3. All other deadlines remain as set forth in the Court's scheduling order.

7 Dated: 7/13/12



The Honorable Richard Seaborg

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